



Foyle - Gloucester

Environmental Permit Application

EPR Ref: UP3700PX/A001

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How to comply - Environmental Permit

Document Ref: Attachment B.3.6

# HOW TO COMPLY - ENVIRONMENTAL PERMIT

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Environment Agency Technical Guidance Note: *How to Comply with your Environmental Permit (Version 8 - 2014)*

How to Comply – Section	How to Comply – TGN Standard	Foyle - Gloucester Standard
<b>1. Management</b>		
<p>Managing your activities: General Management</p>	<p>“...put in place and implement management arrangements to ensure that you identify the risks that your activities pose to the environment and take all reasonable actions to prevent or minimise those risks”            Ensure sufficient resources are available to provide the required standards of environmental protection; to ensure equipment is safe; ensure sufficient and competently trained staff levels; to implement accident prevention and mitigation (where necessary) measures and procedures and to keep operating instructions in written form and make available as necessary</p>	<p>The site has ISO 14001:2015 accreditation.</p> <p>The ISO 14001 manual describes the site’s management arrangements, how environmental policies are to be implemented and how its environmental objectives are to be achieved. (see Attachment B.2.1 EMS Summary)</p> <p>References - ISO14001 Environmental Manual and Environmental Procedures Manual.</p>
<p>Managing your activities: in particular</p>	<p>“...you must have”</p> <ul style="list-style-type: none"> <li>- A maintenance checklist and records.</li> <li>- An accident management plan.</li> <li>- Staff skill requirements and staff training records.</li> <li>- Any necessary operating instructions</li> <li>- reference to “relevant good practice”</li> <li>- A way of recording complaints, pollution incidents or breaches of permit and corrective actions</li> </ul>	<p>Where environmental outcomes beyond the scope of ISO14001 are required as part of a Bespoke Environmental Permit, measures to achieve these will be incorporated into the Environmental Procedures Manual and implemented.</p> <p>Department Audits are carried out weekly.</p>

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<b>2. Operations</b>		
Site Operations	“...you must consider how to avoid or minimise the environmental risks and impact of the normal running of the activities”	Avoiding and minimising environmental risks associated with all aspects of normal site operation as well as during shutdown and emergency situations are addressed in the site’s ISO 14001 manual and Environmental Procedures Manual and Environmental Aspects manual.
Site Maintenance	“...carry out a programme of Planned Preventative Maintenance” “...follow the inspection and maintenance schedules that the manufacturer recommends”	As part of ISO 14001, plant and equipment undergoes regular maintenance as per manufacturer specifications or as part as PPM to ensure its continued operation in a manner that does not increase pollutant release risk or pose a potential health hazard to operators
Accidents	“...you must have an accident management plan”	The site has a Spillage Response Procedure (OP12), an Emergency Preparedness & Response Plan (Attachment C.5) and an Emergency Response Procedure (EMS16). Further detail on accident prevention and mitigation measures can be found in the H1 Environmental Risk Assessment (Attachment B.2.5). Employees are trained for emergency response procedures (i.e. evacuation procedures are posted at strategic locations throughout the site). Relevant employees are trained for accidental emissions relating to their area of work. i.e. ETP operators are trained for accidental emissions relating to the ETP.
Incidents and non-conformances	You must be able to: - detect abnormal operation and investigate the causes - assess the information and decide what to do - in the short-term, get back to normal operation	The site’s monitoring procedures are outlined in the Environmental Procedures Manual. As part of ISO 14001, EMS15 outlines the procedure for dealing with non-conformances and corrective actions.

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	<p>- in the long-term take steps to make sure it doesn't happen again</p> <p>- where appropriate, make sure the public would know what to do if a problem arises.</p>	<p>The site has an established environmental complaints procedure and records include:</p> <p>RE06 - Communications Complaints Record Form</p> <p>ER07 – Non-Conformity Sheet</p>
Permit Surrender and Closure	When applying to surrender the permit, you need to show the necessary measures to avoid pollution risk have been taken and that the site has been returned to satisfactory state.	Environmental monitoring will be carried out as per permit specifications to ensure the condition of the site is maintained and a Decommissioning Plan for the site would be completed as required by the Agency.
Site security	“You should have site security measures in place if these are necessary to prevent access to the site”	<p>CCTV and 24-hour security personnel in place.</p> <p>Contractors and visitors must sign in at security.</p> <p>Perimeter fence is in place.</p> <p>No high-risk substances are on site.</p> <p>Cleaning chemicals and effluent treatment tanks are not accessible to unauthorised people.</p>
Sufficient competent persons and resources	<p>“You must have enough competent staff to manage and operate your activities and the means available to ensure they do not cause pollution”</p> <p>“Staff should have clearly defined roles and responsibilities”</p>	<p>Sufficient persons and resources are available to ensure pollution is not caused (see Attachment C.2 Training Assessment).</p> <p>Roles and Responsibilities are outlined in the ISO14001 Manual (EMS10 Roles and Responsibilities)</p>
Records that demonstrate your management system	“You must keep reliable records.”	Already in place as part of ISO14001 (EMS13 Documentation and Control, Master record list in place.
Energy Efficiency	The specified list of Basic Energy Requirements must be met and the company should be a participant in a Climate Change Agreement (CCA)	<p>Site-wide measures to improve resource use and energy efficiency are specified in B.3.12 Resource Use and Energy Efficiency.</p> <p>OP03 – Energy Management Procedure in place.</p> <p>Current Climate Change Agreement made 7<sup>th</sup> October 2018.</p>

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Energy supply techniques	<p>“You should demonstrate that you have considered alternative, more efficient forms of generating electricity and heat where a cost/benefit appraisal shows them to be appropriate. The following should be considered where practicable</p> <ul style="list-style-type: none"> <li>- use of Combined Heat and Power</li> <li>- using renewable energy sources</li> <li>- generation of energy by co-incineration of your waste</li> <li>- joint schemes with other local operators which may make CHP more attractive</li> <li>- use of less polluting fuels”</li> </ul>	<p>Foyle Food Group has assessed all energy providers and as a result has an agreement with preferred energy suppliers across the UK for all sites.</p>
Efficient use of raw materials and water	<p>Take appropriate measures to ensure raw materials and water are used efficiently in the activities</p>	<p>See Attachment C.9 Resource Use and Energy Efficiency OP02 – Monitoring Water Usage procedure in place.</p>
Raw material selection	<p>“...list the main materials used which have potential for significant environmental impact”</p>	<p>See Attachment B2.3.C – Baseline Report</p>
Waste Minimisation Audit	<p>“You should carry out a waste minimisation audit at least every four years. The first audit shall take place within two years of the issue of your permit”</p>	<p>A Waste Minimisation Audit of the site is carried out annually.</p>
Water Efficiency Audit	<p>“You should carry out a Water Efficiency Audit at least every four years. The first audit shall take place within two years of the issue of your permit”</p>	<p>Water efficiency is on-going and is part of the ISO14001 Register of Aspects. EMS20 - Continual Improvement Procedure also in place.</p>

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Avoidance, recovery and disposal of wastes	Demonstrate waste avoidance or reduction measures. Where waste is produced, consider recovery options and select the option best for the environment.	Attachment B.3.14 – Waste Management characterises and quantifies each waste stream and describes how all waste from the facility is disposed of and recycled or recovered as appropriate.  EMS OP04 – Disposal of Waste Procedure is in place.

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<b>3. Emissions and Monitoring</b>		
Emissions to Air and Water	<p>You must meet emission limits as set out in permit</p> <p>There should be no point source emissions to air or water other than those specified in the permit, if granted.</p>	<p>EMS14 - Monitoring Measurement Analysis and Evaluation sets out procedures and responsibilities relating to monitoring of emissions as part of ISO 14001.</p> <p>Good housekeeping will ensure yard areas are kept clean and stormwater does contain pollutants (ER 04 Daily Environment Check).</p> <p>OP-05 Surface Water Protection procedure in place.</p> <p>Emissions to atmosphere, emissions to surface-water and emissions to sewer are detailed in Attachments B.3.2, B3.3 and B.3.4 respectively.</p>
Emissions to Land	<p>“You must not make any emissions that could result in the direct or indirect input of contaminating substance to land”</p>	<p>Operational areas of the site are covered with concrete and asphalt, ensuring there are no direct pathways for pollutants to land.</p> <p>The entire site is enclosed by raised kerbing, designed to contain surface-water within.</p> <p>No site waste is sent for landfill.</p> <p>A site-wide impervious surface, bund assessment and pipework investigation can be undertaken at intervals as required by permit to pre-emptively prevent any leaks (See Attachment C.8 – Bund Integrity Report).</p> <p>Spill kits are at strategic locations throughout the site and are included in the site’s environmental checklist (ER 04 - Daily Environment Check).</p> <p>EMS OP09 – Bund Inspection EMS OP12 – Spillage Procedure</p>
Emissions to Groundwater	<p>“You must not make any emissions that could result in the direct or indirect input of contaminating substance to groundwater”</p>	<p>The site is covered with concrete and asphalt, ensuring there are no direct pathways for pollutants to groundwater.</p> <p>A site-wide impervious surface, bund and pipework investigation can be undertaken at intervals as required by</p>

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		<p>permit. Spill kits are at strategic locations throughout the site and are included in the site’s environmental checklist (ER 04 - Daily Environment Check). These measures serve to reduce the risk of contaminating groundwater.</p> <p>EMS OP09 – Bund Inspection EMS OP12 – Spillage Procedure EMS OP05 – Surface Water Protection</p>
<p>Emissions of substances not controlled by emission limits</p>	<p>Ensure appropriate measures are in place to ensure release of substances not controlled by emission limits is prevented or minimised.</p> <p>Carry out operations inside buildings to reduce dust, mud and litter. Avoid outdoor or uncovered stockpiles.</p>	<p>See H1 Environmental Risk Assessment (Attachment B.2.5) for emissions mitigation in place and for additional measures that are planned. See Attachment B.3.9 for further information on ‘fugitive’ emissions management. As mentioned, a site-wide impervious surface, bund assessment and pipework investigation can be undertaken at intervals as required by permit. See also: EMS OP09 – Bund Inspection EMS OP12 – Spillage Procedure EMS OP05 – Surface Water Protection EMS OP06 – Contract Maintenance</p> <p>Process operations take place inside. There are no outdoor stockpiles. Waste storage vessels are covered where necessary. All roads are paved, no exposed soil on site.</p>
<p>Odour</p>	<p>“...you should have a written odour management plan. This should show what the sources and risks to receptors are, the measures you will employ and how you will respond to prevent</p>	<p>An Odour Impact Assessment was carried out in support of the application along with an accompanying Odour Management Plan. If required, further odour impact assessments can be carried out on behalf of the site at</p>



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	or minimise odour”	intervals as required by the Agency. ER 06 - Communications Complaints Record Form details the procedure for receiving, recording and acting upon complaints and those responsible for doing so.
Noise and Vibration	“If you are likely to cause any significant noise beyond your site boundary, you should have a written noise management plan. This should show what the sources and risks to receptors are, the measures you will employ and how you will respond to prevent or minimise the noise”	An Environmental Noise Assessment was carried out in support of the application. If required, further noise impact assessments can be carried out on behalf of the site at intervals as required by the Agency. ER 06 - Communications Complaints Record Form details the procedure for receiving, recording and acting upon complaints and those responsible for doing so. The site has not received any noise complaints to-date.
Monitoring	Monitoring of emissions will be carried out at specified intervals for specified parameters.	Procedure for monitoring of effluent quality: OP11 Daily DAF Plant Checks and ER03 - Effluent Sampling. Effluent quality and flow is also monitored by Severn Trent Water under discharge licence (Attachment B.3.5). The surface water interceptor also contains an alarm. EM 14 Monitoring Measurement Analysis and Evaluation are also detailed in the ISO 14001 Manual. Additional monitoring has been carried out in support of this application (noise, odour and bund assessments)

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<b>4. Further Information</b>		
Keeping of Records	Environmental records should be kept for six years	Documented Information procedures are outlined in the ISO14001 manual. Master Documents are kept on file for 7 years as a minimum.
Reporting/Notification	“If, during monitoring, you discover any breaches of the limits specified in your permit, we expect you to notify us as soon as the results have passed any laboratory quality assurance checks” The Agency must be notified within 14 days and with details in the event of a change in the nature, functioning or size of the activities which may have consequences for the environment.	Non-conformance, corrective and Preventative Action Procedures are outlined in the ISO Manual and recorded in a Non-Conformance Log (ER08). This will be updated to include notification of the Environment Agency or any other relevant body as required or as directed by the Agency. The Agency will be notified as specified in the event of a change in the nature, functioning or size of the activities.